

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

LIVEUNIVERSE, INC.,

Plaintiff,

v.

**RENE MUIJRERS, ICONV SPRL,
TECHIE HOSTING, INC, VIRALHOG,
LLC, CHRISTOPHER VANDEVYVER,
IVAN RUSSO, KMMT, LLC, THEODORA
HATZIKOSTAS, BRENT MAGGIO,
RYAN BARTHOLOMEW, and WAYNE
ANASTASIAS,**

Defendants.

Civil Action No. 2:22-cv-04918

Hon. Esther Salas, U.S.D.J.

**MOTION
BY LESLIE A. FARBER, LLC,
AND LESLIE A. FARBER TO
WITHDRAW AS LOCAL
COUNSEL FOR PLAINTIFF PER L.
CIV. R. 102.1
and
CERTIFICATION OF SERVICE**

TO: William T. Walsh, Clerk
United States District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 0710

PLEASE TAKE NOTICE that on November 7, 2022, at 10:00 a.m., or as soon thereafter as counsel be heard, Leslie A. Farber, LLC, and Leslie A. Farber, Esq., shall move before the Hon. Esther Salas, U.S.D.J., at the United States District Court, 50 Walnut Street, Newark, New Jersey, for an Order permitting the undersigned to withdraw as local counsel for Plaintiff, LiveUniverse, Inc., staying all proceedings and deadlines for thirty (30) days to allow Plaintiff to retain new local counsel, and for such other relief as the Court deems just and proper.

The movants also shall move for leave of Court to be permitted to file a separate supporting declaration under seal, allowing for the Court's *in camera* review and review by LiveUniverse, Inc., and its pro hac vice counsel, but denying review of the contents by any other party in this matter.

PLEASE TAKE FURTHER NOTICE that, in support of the within Motion, Leslie A. Farber, LLC, and Leslie A. Farber, Esq., shall rely upon the Brief, Declaration(s) of Leslie A. Farber, Esq., and any exhibits submitted. A proposed form of Order is included for the Court's consideration.

Your response hereto is due within the applicable time period provided by the Federal Rules of Civil Procedure or as set by this Court.

LESLIE A. FARBER, LLC
Attorneys for Plaintiff

Dated: October 3, 2022

By: /s/ Leslie A. Farber
Leslie A. Farber
eMail: LFarber@LFarberLaw.com

CERTIFICATION OF SERVICE

1. I, Leslie A. Farber, Esq., local counsel for Plaintiff, LiveUniverse, hereby certify that on October 3, 2022, I electronically filed this law firm's and my Motion to Withdraw as local counsel for Plaintiff, along with a Brief, Declaration, and proposed form of Order, with the Clerk of the District Court using the CM/ECF system, which sent notification of such filing to the following:

James S. Rehberger, Esq.
One Riverfront Plaza - Suite 800
Newark, New Jersey 07102
Email: RMChalfin@Norris-Law.com

2. On October 3, 2022, I also sent a copy of all moving papers to the following:

Maria Isabel S. Guerrero, Esq.
1971 Western Avenue #131
Albany, NY 12203
Attorney Pro Hac Vice
Via email: mariaisabel.guerrero@nyattylaw.com

Brad Greenspan, President
Palisades Capital, Inc.
244 5th Avenue, Suite G290
New York, NY 10001
Via email: NJ.Legal@nym.hush.com,
legalsupport1@nym.hush.com, regular
mail and certified mail, return
receipt requested

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: October 3, 2022

/s/ Leslie A. Farber
Leslie A. Farber
eMail: LFarber@LFarberLaw.com